

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ELISABETH DOHERTY,

Plaintiff,

v.

AMERICAN INTERNATIONAL
COLLEGE,

Defendant.

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Civil Action No. 17-cv-10161-IT

Scheduling Order

TALWANI, D.J.

This Scheduling Order is intended to provide a reasonable timetable for discovery and motion practice in order to help ensure a fair and just resolution of this matter without undue expense or delay.

Timetable for Discovery and Motion Practice

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(f), it is hereby ORDERED that:

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this court's Notice of Scheduling Conference must be completed by July 12, 2017.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after September 8, 2017.
3. **Fact Discovery – Interim Deadlines.**
 - a. All requests for production of documents and interrogatories must be served by October 31, 2017.
 - b. All requests for admission must be served by February 12, 2018.
 - c. All depositions, other than expert depositions, must be completed by February 12, 2018.
4. **Fact Discovery – Final Deadline.** All discovery, other than expert discovery, must be completed by February 12, 2018.
5. **Status Conference.** A status conference will be held on February 13, 2018, at 2:45 p.m.

6. **Expert Discovery.**
 - a. Plaintiff's trial experts must be designated and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by April 12, 2018.
 - b. Plaintiff's trial experts must be deposed by June 12, 2018.
 - c. Defendant's trial experts must be designated and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by May 14, 2018.
 - d. Defendant's trial experts must be deposed by July 13, 2018.
7. **Dispositive Motions.** Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by May 14, 2018.

Procedural Provisions

8. **Extension of Deadlines.** Motions to extend or modify deadlines will be granted only for good cause shown. All motions to extend shall contain a brief statement of the reasons for the request; a summary of the discovery, if any, that remains to be taken; and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend the pleadings, or file a motion.
9. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than seven days after the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the court after the relevant deadline has passed, the court may enter such additional orders relating to discovery as may be appropriate.
10. **Status Conferences.** The court has scheduled a status conference after (or close to) the close of fact discovery for case management purposes. Any party who reasonably believes that a status conference will assist in the management or resolution of the case may request one from the court upon reasonable notice to opposing counsel.
11. **Additional Conferences.** Upon request of counsel, or at the court's own initiative, additional case-management or status conferences may be scheduled.
12. **Early Resolution of Issues.** The court recognizes that, in some cases, early resolution of one or more preliminary issues may remove a significant impediment to settlement or otherwise expedite resolution of the case. Counsel are encouraged to confer and jointly advise the court of any such issues.
13. **Pretrial Conference.** Lead trial counsel are required to attend any pretrial conference.

14. **Discovery Disputes.** Counsel encountering a discovery dispute are encouraged to request a conference with the court before filing a discovery motion.

Indira Talwani

United States District Judge

By: /s/Carolina DaSilva

Deputy Clerk

Date: June 16, 2017